

REMARKS

Subsequent to entry of the foregoing amendments, claims 1, 2 and 4-8 are presently pending in this application, all of which are rejected on prior art grounds. Claims 1 and 2 are the only independent claims. Claim 3 is hereby cancelled, and the features from claim 3 are added to claims 1 and 2, respectively. Also, claim 8 is amended to correct its dependency.

In the present invention, the cord diameter is made thinner than that of Tamura. To this end, the coating rubber having properties defined in claim 3 (now claims 1 and 2) is applied to the cord, whereby the effects (e.g., road noise, rolling resistance, flat spot properties and the like) equal or superior to those of conventional PEN cords having usual cord diameters are attained.

In Comparative tire 1 of the specification of this application, the cord is PEN of 1670 dtex/2, which is the same as the cord of 1500 d/2 described in Tamura (dtex: yarn counting of 10000 m/g, denier (d): yarn counting of 9000 m/g). As seen from the comparison between the example tire and the comparative tire, the present invention is significantly improved over Tamura.

As to the rubber properties, the 100% modulus and the rebound resilience are independent parameters, respectively. Even if the 100% modulus is established, the rebound resilience is never determined naturally.

The Examiner's reliance on Ueyoko as to the claimed rebound resilience is unfounded, and based on pure speculation. Ueyoko is silent as to rebound resilience. As a result, the Examiner is only able to assert in a conclusory fashion that "...given the teachings of Ueyoko


one of ordinary skill...could have expected the rubber to demonstrate a resilience of at least 60%...". This is insufficient to establish a *prima facie* case of obviousness.

Accordingly, the present invention is believed to be entirely different from Tamura and Ueyoko, taken alone or in combination, and Applicants respectfully submit that the present invention could not have been easily conceived therefrom absent the proscribed use of hindsight.

In view of the preceding amendments and remarks, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue that the Examiner feels may be best resolved through a personal or telephonic interview, he is kindly requested to contact the undersigned attorney at the local telephone number listed below.

The USPTO is directed and authorized to charge all required fees (except the Issue/Publication Fees) to our Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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